

KIRK B. LENHARD, ESQ., Nevada Bar No. 1437  
[klenhard@bhfs.com](mailto:klenhard@bhfs.com)  
TRAVIS F. CHANCE, ESQ., Nevada Bar No. 13800  
[tchance@bhfs.com](mailto:tchance@bhfs.com)  
MOLLY R. MARIAS, ESQ., Nevada Bar No. 16577  
[mmarias@bhfs.com](mailto:mmarias@bhfs.com)  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106  
Telephone: 702.382.2101  
Facsimile: 702.382.8135

*Attorneys for Plaintiff Seanah Dixon*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SEANAH DIXON,

Plaintiff,

v.

KENNETH WILLIAMS, et al.,

Defendants.

CASE NO. 2:24-cv-02103-APG-MDC

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DISCOVERY  
CUTOFF**

**(FIRST REQUEST)**

Plaintiff SEANAH DIXON (“**Plaintiff**”), by and through her counsel of record, and Defendants KENNETH WILLIAMS, ET AL. (“**Defendants**,” and together with Plaintiff, the “**Parties**”), by and through their counsel of record, hereby stipulate to extend the discovery cutoff and remaining deadlines prescribed by the governing scheduling order (“**Scheduling Order**”), ECF No. 33, as set forth below:

**I. PROCEDURAL POSTURE.**

1. Plaintiff filed her Complaint on November 20, 2024. ECF No. 7.
2. Defendants filed their Answer on February 10, 2025. ECF No. 26.
3. Pursuant to FRCP 16(b) and LR 16-1(b), this Court entered the Scheduling Order on February 2, 2025. ECF No. 33.
4. Pursuant to the Scheduling Order, the following deadlines remain:
  - a. Discovery cutoff: August 25, 2025.
  - b. Dispositive motions: September 24, 2025.

c. Joint pretrial order: October 24, 2025.

5. Pursuant to LR 26-3, the Parties hereby respectfully request that the discovery cutoff date be extended until **January 30, 2026**, the dispositive motion date extended to **March 2, 2026**, and the joint pretrial order date extended to **April 1, 2026**, for the reasons outlined below.

## II. STATUS OF DISCOVERY.

6. On December 9, 2024, Defendants served their Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26(a)(1).

7. On March 19, 2025, Defendants served their First Supplemental Disclosures of Witnesses and Documents Pursuant to FRCP 26(a)(1).

8. On May 2, 2025, Defendants served their Second Supplemental Disclosures of Witnesses and Documents Pursuant to FRCP 26(a)(1).

9. On May 15, 2025, Defendants served their Third Supplemental Disclosures of Witnesses and Documents Pursuant to FRCP 26(a)(1).

10. On May 28, Defendants served their Fourth Supplemental Disclosures of Witnesses and Documents Pursuant to FRCP 26(a)(1).

11. On June 26, 2025, Plaintiff served her Initial Expert Disclosure Statement Pursuant to FRCP 26(a)(2)(C).

12. On July 15, 2025, Defendants served their Fifth Supplemental Disclosures of Witnesses and Documents Pursuant to FRCP 26(a)(1).

13. In total, Defendants' disclosures contain approximately 1,336 pages of documents that are responsive to Plaintiff's claims.

14. Since March 19, 2025, Plaintiff's counsel have worked diligently to review and analyze all documents included in Defendants' disclosures.

## III. REMAINING DISCOVERY TO BE COMPLETED.

15. The remaining discovery in this action includes:

- a. Written discovery, including FRCP 33 interrogatories, FRCP 34 requests for production, and FRCP 36 requests for admission on all Parties, and any follow up as needed or necessary;

- b. Expert disclosures, and depositions of any expert witnesses;
- c. Fact depositions of all Parties and representatives;
- d. FRCP 45 document subpoenas to third parties with relevant knowledge of Plaintiff's claims, allegations, and damages, as well as Defendants' defenses;
- e. Third party depositions; and
- f. Preparation of supplemental responses to written discovery and supplemental disclosure statements, as necessary.

16. This summary of discovery completed and remaining is not intended to be limiting and is instead set forth simply to advise the Court of the remaining discovery anticipated in this matter in accordance with LR 26-3.

#### **IV. REASONS THE PARTIES REQUEST AN EXTENSION.**

17. In early May 2025, Plaintiff's former counsel unexpectedly left their positions at Brownstein Hyatt Farber Schreck, LLP, and transitioned off the case.

18. By necessity, and as a result of these departures, newly associated counsel was obligated to spend significant time familiarizing themselves with this matter's complex factual history, as well as the abundant medical records and technical documentation, in order to sufficiently litigate Plaintiff's claims.

19. The delay caused by former counsels' departures, and new counsels' review and analysis of the factual and medical history, has set back the discovery process, particularly the deposition of fact witnesses, which is critical to the progression of discovery that remains to be completed.

20. Plaintiff is also incarcerated at High Desert State Prison ("HDSP"), and it has been challenging for counsel to communicate with her, given Plaintiff's limited phone access, the delays associated with written correspondence, and the logistical difficulties of traveling to HDSP to visit Plaintiff in person.

1 **V. REQUESTED EXTENSION.**

2 21. A scheduling order “may be modified only for good cause and with the judge’s  
3 consent.” FRCP 16(b)(4).

4 22. A stipulation “to extend a deadline set forth in a discovery plan must be received by  
5 the court no later than 21 days before the expiration of the subject deadline” and “must be supported  
6 by a showing of good cause.” LR 26-3.

7 23. LR IA 6-1 provides that “[a] motion or stipulation to extend time must state the  
8 reasons for the extension requested and must inform the court of all previous extensions of the  
9 subject deadline the court granted.”

10 24. Here, there is good cause to extend the discovery cutoff and remaining deadlines in  
11 this matter given (a) Plaintiff’s former counsels’ unexpected departures; (b) the time and effort  
12 Plaintiff’s new counsel have had to devote to familiarizing themselves with this matter’s complex  
13 factual history and medical documentation; (c) the difficulties of communicating with Plaintiff as  
14 a result of her incarceration at HDSP; and (d) the proximity of the discovery cutoff date.

15 25. This is the first request for an extension of the discovery deadlines.

16 26. This stipulation is submitted in advance of the 21-day deadline under LR 26-3 to  
17 extend the deadline for close of discovery.

18 27. All Parties stipulate to this requested extension, such that no Party will be prejudiced  
19 by extending the discovery deadlines as requested.

20 28. This stipulation is not made with undue delay, dilatory motive, or bad faith.

21 29. Based on the foregoing, Plaintiff and Defendants stipulate that the discovery  
22 deadlines be extended as follows:<sup>1</sup>

23 a. Discovery cutoff: January 30, 2026

24 b. Dispositive motions: March 2, 2026

25 c. Joint pretrial order: April 1, 2026

26  
27  
28 

---

<sup>1</sup> Dates falling on a Saturday, Sunday, or holiday have been moved to the following business day.

1 DATED: July 24, 2025

2 BROWNSTEIN HYATT FARBER  
3 SCHRECK, LLP

4 BY: /s/ Molly R. Marias  
5 KIRK B. LENHARD, ESQ.  
6 TRAVIS F. CHANCE, ESQ.  
7 MOLLY R. MARIAS, ESQ.

8 *Attorneys for Plaintiff*

DATED: July 24, 2025

STATE OF NEVADA OFFICE OF THE  
ATTORNEY GENERAL

BY: /s/ Douglas R. Rands  
AARON D. FORD, ESQ.  
DOUGLAS R. RANDS, ESQ.

*Attorneys for Defendants Kenneth Williams,  
Jeremy Bean, Mary Holt (Mary Manalastas),  
Jaymie Cabrera, Mark Hidrosollo, and  
Interested Party the Nevada Department of  
Corrections*

9 DATED: July 24, 2025

10 LEWIS BRISBOIS BISGAARD & SMITH  
11 LLP

12 BY: /s/ Alissa N. Bestick  
13 KEITH A. WEAVER, ESQ.  
14 ALISSA N. BESTICK, ESQ.

*Attorneys for Defendant David Rivas*

15  
16 **IT IS SO ORDERED:**

17  
18   
UNITED STATES MAGISTRATE JUDGE

19  
20 DATED: 7/25/2025

21 Submitted By:

22 BROWNSTEIN HYATT FARBER SCHRECK LLP

23 BY: /s/ Molly R. Marias  
24 KIRK B. LENHARD, ESQ.  
25 Nevada Bar No. 1437  
26 TRAVIS F. CHANCE, ESQ.  
27 Nevada Bar No. 13800  
28 MOLLY R. MARIAS, ESQ.  
Nevada Bar No. 16577

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of Brownstein Hyatt Farber Schreck, LLP, and that on July 24, 2025, I cause and true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY CUTOFF** to be electronically filed via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system were served electronically. For those parties not registered, service was made by depositing a true and correct copy in the United States Mail, first-class postage prepaid and properly addressed.

/s/ Paula Kay  
An employee of Brownstein Hyatt Farber Schreck, LLP